

EXHIBIT A

The Honorable David G. Estudillo

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UNITED STATES DISTRICT COURT
WESTERN DISTRICT OF WASHINGTON

ELIAS PEÑA, ISAAH HUTSON, and
RAY ALANIS,

Plaintiffs,

vs.

CLARK COUNTY, WASHINGTON,

Defendant.

Case No.: 3:21-CV-05411-DGE

**DECLARATION OF DR. LAURA BROWN
IN SUPPORT OF PLAINTIFFS'
OPPOSITION TO DEFENDANT CLARK
COUNTY'S DAUBERT MOTION**

*(Filed concurrently with Plaintiffs' Opposition
to Defendant's Motion to Exclude or Limit
Testimony of Plaintiffs' Expert, Dr. Laura
Brown)*

DECLARATION OF DR. LAURA BROWN

I, Dr. Laura Brown, hereby declare under penalty of perjury as follows:

1. I am over the age of 18 and am otherwise competent to testify as to all matters herein, and make the following statements based on my own personal knowledge. I submit this declaration in support of Plaintiffs' Opposition to Defendant Clark County's *Daubert* Motion.

2. I am a member of three scientific societies for the study of trauma, the International Society for Traumatic Stress Studies, from which I was awarded the Sarah Haley Award for Clinical Excellence, the International Society for the Study of Trauma and Dissociation, from which I was awarded the status of Fellow, and the Division of Trauma Psychology of the American Psychological Association, of which I am past-President, and from which I was awarded the Lifetime Achievement Award for Contributions to Trauma Psychology. I have been on the editorial boards of the peer-reviewed journals published by each of these societies, and have read the peer-reviewed literature on trauma since 1985.

3. Additionally, I am a Fellow of the Society for the Psychological Study of Culture, Ethnicity and Race, Division of the American Psychological Association. I was a member of its Executive Committee, and receive its peer-reviewed journal, which is published by the American Psychological Association.

4. I have taught doctoral and post-doctoral courses on culturally competent assessment of trauma in the United States, Canada, Australia, Israel, Taiwan, and The Netherlands.

5. As part of my doctoral training in clinical psychology, I took six semester-long courses in psychological assessment. I have taken additional post-doctoral coursework on topics of psychological assessment, including psychological assessment of trauma, assessment of effects of discrimination and harassment, and assessment in the forensic context. I have taught psychological assessment to students at the doctoral level, including coursework on forensic assessment of trauma. I have taught the topic of culturally competent practice at the doctoral level.

1 6. In order to arrive at my opinions in this case I used the usual and customary
2 methodology for conducting a forensic evaluation, which is widely used in my field.

3 7. My methodology includes conducting assessments with both general and trauma-
4 specific objective psychological instruments that contain embedded measures of validity; review
5 of medical and mental health records from the Plaintiffs' medical providers; in-person interviews
6 with Plaintiffs that covered lifetime history of exposure to risk factors and lifetime expression of
7 resilience (including medical history, psychological history, and social history).

8 8. I conducted two formal assessments using well-accepted published test
9 instruments with the Plaintiffs, as is warranted and advised in my field of forensic psychology:
10 The Personality Assessment Inventory (PAI) and the Trauma Symptom Inventory-2 (TSI-2).

11 9. My methodology also includes developing and testing hypotheses to arrive at an
12 opinion regarding the psychological distress of the Plaintiffs. I conducted a differential diagnosis
13 in each case, that is, I examined the nature and severity of each one's distress, looking at any
14 psychological risk factors to which they may have been exposed that are known to be possible
15 sources of psychological distress. I then ruled in or out the diagnosis or diagnoses that are most
16 accurate in each instance as part of this analysis of the totality of the information available to me
17 and the nature of each plaintiff's psychological distress.

18 10. My analysis of the three Plaintiffs in this case allows me to diagnose Other specified
19 trauma and stressor related disorder (OSTSRD, DSM-5, 309.89). OSTSRD does not require the
20 presence of a Criterion A trauma for a person to be given this diagnosis, thus allowing me to rely
21 on the peer-reviewed science of psychology, in which the various forms of betrayal trauma and
22 microaggressions have been described as having effects similar to those seen in people exposed to
23 a Criterion A traumatic stressor. Because OSTSRD does not have a fixed set of criteria, it allows
24 for a more holistic and inclusive description of a person's distress, in contrast to giving a list of
25 other possible diagnoses that have overlapping symptoms. It is always a more rational choice for
26 a diagnostician to give the more parsimonious diagnosis as I did in this instance.

27 I declare under penalty of perjury under the laws of the State of Washington and of the
28 United States of America that the foregoing is true and correct.

Executed on March 3, 2023 at Seattle, Washington.



DR. LAURA BROWN